

## Exhibit 8

- UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**



information including the number of Emtal claimants with claims pending in a given year, the highest defense cost for any Emtal case in a given year, the lowest defense cost for any Emtal case in a given year, the average defense cost for any Emtal case in a given year, the median defense cost for any Emtal case in a given year, and the number of Emtal cases settled each year at various phases of legal proceedings.

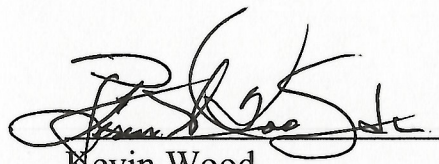
4. I am not aware of any reporting capability that would generate the information requested in the form that plaintiffs seek in an automated fashion for any portion of the time period covered by plaintiffs' requests. As a result, assembling the information that plaintiffs requested in the form that they seek it would require a manual review of historical documents, such as periodic invoices and associated correspondence regarding Emtal litigation and settlements from 1979 through 2017 for each law firm that BASF and Engelhard retained in each personal injury case related to Emtal talc.

5. BASF acquired Engelhard Corporation in 2006. Because Emtal talc was a legacy Engelhard business, the annual legal spending and settlement amounts prior to 2006 for matters related to Emtal talc are not maintained in current systems and, if they are maintained at all, they would be maintained in applications that are no longer supported commercially and reside on an offsite server from which information would need to be extracted and reviewed.

6. Specifically, from 1979 through approximately 1997, Engelhard maintained its accounts payable records in a mainframe application provided by an outside vendor called McCormack & Dodge. From approximately 1997 through 2006, Engelhard maintained its accounts payable records in a finance application provided by an outside vendor called J.D. Edwards. The versions of the applications provided by McCormack & Dodge and J.D. Edwards used by Engelhard are no longer supported commercially and would require specialized hardware and software to operate.

7. Annual legal spending and settlement amounts after 2006 for matters related to Emtal talc are maintained in current BASF online systems. However, because BASF's current systems do not maintain that information in the form that plaintiffs seek, manual review of periodic invoices and related correspondence would still be necessary.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and belief.



Kevin Wood

Dated: May 21, 2018



**CERTIFICATE OF SERVICE**

I hereby certify that on this day I caused a true and correct copy of the foregoing documents to be served via ECF upon all counsel of record.

Dated: May 21, 2018

By: s/ Justin T. Quinn  
Justin T. Quinn